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July 14, 2025

Hon. Robert Lehrburger
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

RE: Webber, et al. v. Dash, et al
DOCKET NO. 1:19-cv-610-RWL

Dear Hon. Judge Lehrburger:

This office is counsel to the Plaintiffs Josh Webber (“Webber”) and Muddy Water Pictures LLC d/b/a Muddy Water Pictures, Inc. (“Muddy”) (collectively “Plaintiffs”) in this matter. Plaintiffs write today seeking a contempt order and the issuance of an arrest for Damon Dash (“Dash”) for the violation of the Court’s Order at Docket Entry 472 dated June 26, 2025. Plaintiffs’ counsel also seeks legal fees associated with this application.

Per this Court’s Order at Docket entry 472, the defendants were ordered to complete the following task by July 10, 2025:

- (1) Within 14 days of entry of this order, Dash shall turn over to counsel for Dash a certificate (the “Dash Ownership Interest”) representing Dash’s ownership of:
 - Dash Films Inc. of which Dash owns 100 percent interest per the stipulation at Dkt. 463;
 - Bluroc LLC d/b/a Bluroc Records LLC of which Dash owns 100 percent interest per the stipulation at Dkt. 463;
 - Blakroc LLC of which Dash owns 100 percent interest per the stipulation at Dkt. 463;
 - Any interest Dash owns in Lebanon Improvements LLC;
 - Any interest Dash owns in Ocean East Improvements LLC; and,

- Any interest Dash owns in 1996 Songs LLC.

The defendants have failed to provide the certificates for Dash's Ownership Interest as ordered by the Court to Dash's counsel.

In addition, per this Court's Order at Docket entry 472, the defendants were also ordered to complete the following task by July 10, 2025:

- (2) Within 14 days of entry of this order, Poppington shall turn over to counsel for Poppington, a certificate (the "Poppington Ownership Interest") representing Poppington's ownership in the following copyrights:

	Owner	Title	Registration No.	Year
[a]	Poppington, LLC	Honor Up & 1 other title; motion picture.	V9960D594	2018
[b]	Poppington, LLC	Too honorable & 1 other title; motion picture.	V9963D188	2017
[c]	Poppington, LLC	Too honorable; motion picture.	V9944D865	2017
[d]	Poppington, LLC	Too honorable; motion picture.	V9944D864	2017
[e]	Poppington, LLC	We Went To...China and 2 other titles.	V9962D993	2018
[f]	Poppington, LLC	Welcome to Blackroc & 2 other titles; motion picture.	V9929D973	2015
[g]	Poppington, LLC	Welcome to Blackroc & 2 other titles; motion picture.	V9929D974	2015
[h]	Poppington, LLC	Welcome to Blackroc & 2 other titles; motion picture.	V9929D975	2015

After communicating with defense counsel, it is clear that Defendants have not provided the certificates or digital copies of the films deposited in the United States Copyright Office to defense counsel. The defendants have defied this Court's Order, which has become commonplace in this litigation.

In this Court's Order dated April 29, 2025 at Docket Entry 457, in response to Dash's failure to respond to debtor discovery, this Court warned Dash of the potential for monetary sanctions and informed Dash of the possibility of an arrest warranted being issued for him, to force compliance with Court Orders. Dash and Poppington continue to violate this Court's orders and must be sanctioned.

This Court must also issue an Order pursuant to N.Y. C.P.L.R. § 5225 transferring any interest Dash owns in the above referenced companies and an Order transferring ownership of the Poppington copyrights to US Marshal for the stipulated assets. See Docket Entries 463,465 and 467.

Sincerely,
Brown & Rosen LLC

Christopher Brown

Christopher L. Brown

Cc: All parties via ECF